

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOSEPHINE T. BELLUM and KAREN A.
BISTREK, on behalf of themselves and others
similarly situated,

Civil Action No.: 2:15-cv-02460-CDJ

Plaintiffs,

v.

THE LAW OFFICES OF FREDERIC I.
WEINBERG & ASSOCIATES, P.C.,
Defendant.

ORDER SUR

JOINT MOTION TO EXTEND CASE MANAGEMENT DEADLINES

AND NOW, this _____ day of _____, 201____,

upon consideration of the parties' Joint Motion To Extend Case Management Deadlines, and for
good cause shown, it is hereby ORDERED that the Motion is GRANTED; and it is

FURTHER ORDERED that the case-management deadlines are hereby extended to the
following dates:

- | | |
|-------------------------------|-------------------|
| (1) Fact discovery: | February 18, 2016 |
| (2) Expert reports exchanged: | January 22, 2016 |
| (3) Expert Depositions: | February 18, 2016 |

The settlement conference previously scheduled for January 27, 2016 at 9:30 am shall not
be affected by this Order.

BY THE COURT

J.

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The above-captioned plaintiffs and defendants, by and through their undersigned counsel, hereby jointly move for an extension of the Case Management Deadlines in this matter in order to facilitate ongoing settlement discussions and avoid unnecessary fees and costs. In further support of this Motion, the parties state as follows:

1. This is a Fair Debt Collection Practices Act ("FDCPA") class action that plaintiffs have commenced against the law Office of Frederic I. Weinberg & Associates, PC ("Weinberg Firm") for alleged violations of 15 USC §1692g(a)(4).

2. By Order dated September 21, 2015, this Honorable Court set the following Case Management Deadlines:

(1) Fact discovery – January 19, 2016

(2) Expert reports exchanged – December 21, 2015

(3) Expert Depositions – January 19, 2016

3. That Order also noted that the matter would be referred to the Honorable Lynne

A. Sitarski for a settlement conference following the close of discovery.

4. Consistent therewith, by Order dated November 10, 2015, a settlement conference was scheduled with Judge Sitarski for January 27, 2016 at 9:30 AM.

5. The parties have been engaged in preliminary discovery in this matter.

6. Given that the parties believe that a settlement in the matter will be impacted by the cap of damages set forth in 15 USC §1692k(a)(2)(B), and the Weinberg Firm's "net worth" for purposes of determining that cap, preliminary discovery thus far has focused upon financial information which would reflect the Weinberg Firm's net worth.

7. Now that such information has been disclosed, the plaintiffs have made a class-wide settlement demand, and the parties are engaging in settlement discussions.

8. Given these discussions, which the parties are hopeful will lead to a resolution of this matter, the parties would like to avoid the additional fees and costs in conducting additional discovery or securing experts in an effort to comply with the current Case Management Deadlines while they explore settlement.

9. Accordingly, to facilitate the settlement discussions and avoid any unnecessary fees or costs, the parties respectfully requests a 30-day extension of all Case Management Deadlines in this matter.

10. Notwithstanding this request for an extension, however, the parties would still like to keep the scheduled settlement conference before Judge Sitarski on January 27, 2016 – the thought being that if the settlement discussions presently ongoing reach an impasse, that conference may be valuable in helping to resolve things.

WHEREFORE, the parties jointly and respectfully request that this Honorable Court extend the current Case Management Deadlines by 30 days. A proposed Order to that effect is included herewith.

Respectfully Submitted,
**Marshall Dennehey Warner
Coleman & Goggin**

/s/ Gregory W. Fox

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